



NATIONAL TRANSLATOR ASSOCIATION

OUR AIM - TO PROVIDE FM and TV SIGNALS in EVERY HOME

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May 5, 2005

The Honorable Commissioner Abernathy
Federal Communications Commission
Washington, DC 20554

Re: Ex Parte Statement Concerning Interference from unlicensed Operation on
"Vacant" TV Channels

Dear Commissioner Abernathy:

The National Translator Association wishes to present a contrary opinion to ex parte claims that are being added to the record in ET Docket 02-280 (Unlicensed Operation in the TV Broadcast Bands).

Our members are predominately in rural areas and of course we would like to have the best available broadband internet connections but not at the expense of disrupting our present television service and the forthcoming digital TV (which is particularly vulnerable to interference).

Our members have long experience in making use of weak television signals both as inputs to translators and at the translator served homes where the signals are relatively weak due to the power limitations of translators. If interference disrupts the input to a TV translator then service to all of the viewers is disrupted and service to hundreds or even thousands of homes could be lost..

If unlicensed operation on "vacant" TV channels is authorized more or less as proposed and significant interference occurs it would be extremely difficult to reverse course and withdraw the service. Manufacturers will have geared up to produce equipment and equipment will be in the hands of the public before the problems become evident.

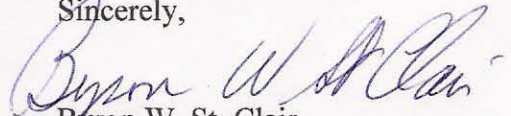
We believe prudence requires that the proponents present one or more working prototypes and that these should be field tested in a variety of terrain situations and climatic conditions.

In connection with field tests it must be noted that while the rules for digital TV translators (and LPTV stations) have been adopted the process of authorizing these stations has not yet begun. Field tests would only be valid when a significant number of TV translators have been authorized and put into operation.

Dedicated to the improvement of over the air broadcast service to all United States residents through the maximum utilization of TV and FM Translators.

We urge the Commission to be extremely skeptical of unsupported claims. We do not want to sacrifice our present analog or future digital television even in the interest of improved broadband capability.

Sincerely,



Byron W. St. Clair
President

Cc: Public File ET Docket No 04-186